IN THE UNITED STATES DISTRICT FOR THE MIDDLE DISTRICT OF TENNESSEE

REGINA TAYLOR, Individually and as Administratrix of the Estate of Larry S. Taylor,)))
Plaintiff,)) No
v.))
AMERICAN INTERNATIONAL GROUP,)
INC. (AIG) and/or d/b/a CHARTIS)
INSURANCE,)
Defendant.)

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, Defendant American General Life Insurance Company ("AGLIC"), incorrectly identified in the Complaint as "American International Group, Inc. and/or Chartis Insurance", hereby removes this case to this Court from the Circuit Court for Giles County, Tennessee, and states as follows:

- 1. On April 23, 2013, Plaintiff filed with the Circuit Court for Giles County the Complaint filed herewith as Exhibit 1. Other filings in said court are also included within said exhibit.
 - 2. AGLIC was served with the Complaint and Summons on or about June 4, 2013.
- 3. Plaintiff's claims relate to the payment of a death benefit due under an employment welfare plan governed by the Employee Retirement Income Security Act of 1974, as amended, 29 U.S.C. §§ 1001 *et seq.* ("ERISA").
- 4. Under applicable law, any and all of Plaintiff's claims are preempted by ERISA. Therefore, Plaintiff's claims present a question of federal law, invoking this Court's jurisdiction under 28 U.S.C. § 1331.

5. AGLIC is filing with the Circuit Court for Giles County a notice of the filing of this Notice of Removal.

WHEREFORE, AGLIC gives notice of the removal of this action to this Court and prays that any further proceedings in the Circuit Court for Giles County be halted.

Respectfully submitted,

/s/ David L. Johnson

David L. Johnson (#18732)
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served via the U.S. District Court's ECF filing system and via U.S. Mail, postage prepaid, upon the following:

Ben Boston Charles W. Holt, Jr. Ryan Durham BOSTON, HOLT, SOCKWELL & DURHAM, PLLC 235 Waterloo Street, P. O. Box 357 Lawrenceburg, TN 38464

this 11th day of June, 2013.

/s/ David L. Johnson
David L. Johnson

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